

**REMARKS**

Claims 3-6, 11-17, and 19-22 are pending. Claims 17 and 19-21 are rejected. Claims 3-6, 11-16, and 22 are allowed. Applicants thank the Examiner for his phone message of Tuesday, January 21, 2003 in which he confirmed that claims 3-6, 11-16, and 22 were allowed.

Claims 17 and 19-21 stand rejected under 35 U.S.C. § 103 (a) over Shiobara et al. (U.S. Patent No. 6,105,864). Applicants respectfully traverse the rejection. Independent claim 17 recites computer instructions for:

receiving a request to refund electronic currency, **the electronic currency including a value identifying the party to whom the currency was issued;**

receiving, from the party seeking the refund, identifying information identifying the party seeking the refund and **values for transforming the information identifying the party seeking the refund into the value identifying the party to whom the currency was issued;**

utilizing the received values to verify that the received identifying information matches the value in the electronic currency identifying the party to whom the electronic currency was issued;

Claim 17 recites computer instructions for utilizing electronic currency. The currency includes a value derived from an identification of the party to whom the currency was issued, but the vendor is unable to identify the party during a purchase transaction. In the case where the party is seeking a refund, the party sends information identifying him/her to the vendor along with instructions on how to make the sent information match

the value in the electronic currency. The vendor follows the instructions and, if there is a match, knows that the electronic currency was issued to the party seeking the refund. Thus, the claimed invention is advantageous because it reduces the risk of theft or other types of fraud.

Shiobara, alternatively, discloses a system where electronic money cards store currency for purchases and other transactions. Users, through the use of money distribution terminals, can add or reduce the amount of currency stored on the money cards. However, the electronic currency disclosed in Shiobara is not associated with a particular party. In fact the currency apparently does not include a serial number or any other identifying information. Therefore a person of ordinary skill in the art considering the teachings of Shiobara would not find obvious the claimed features of electronic currency, including "a value identifying the party to whom the currency was issued." Furthermore, as there are no identification values included with the currency, the system of Shiobara, does not receive "from the party seeking the refund, identifying information identifying the party seeking the refund and values for transforming the information identifying the party seeking the refund into the value identifying the party to whom the currency was issued." Nor does Shiobara's system disclose verifying information as claimed. For these reasons Applicants respectfully submit that the claimed invention is not obvious in view of Shiobara.

The broad section of Shiobara cited by the Examiner discloses a mechanism for transmitting refunds to owners of money cards. It does not pertain, even in a very general sense, to the conversion of currency identifiers to consumer identifiers.


Additionally, the dependent claims recite other features not disclosed or suggested by Shiobara. For example, claim 19 recites "receiving one or more nonces with which

the information identifying the party seeking the refund is hashed to produce the value identifying the party to whom the currency was issued" and claim 20 recites "issuing a refund coupon to the party seeking the refund." Neither of these features are disclosed in the cited reference. It is thus submitted that claims 17 and 19-21 are patently distinguishable over Shiobara.

Therefore, Applicants submit that all of the pending claims are in condition for allowance, and allowance for all claims is hereby solicited. If the Examiner believes for any reason that further direct contact with Applicants' attorney would help advance the prosecution of this case, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,  
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Dated: January 28, 2003

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